

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
\_\_\_\_\_  
DIVISION

CALVIN BURKE

Relator

(Enter above the full name of the Plaintiff[s]  
in this action.)

- vs -

KEEFE COMMISSARY Net-

WORK Sales

Case No. \_\_\_\_\_

(To be assigned by Clerk  
of District Court)

JURY DEMANDED

(Enter above the full name of ALL Defendant[s] in this action. Fed. R. Civ. P. 10(a) requires that the caption of the complaint include the names of all the parties. Merely listing one party and "et al." is insufficient. Please attach additional sheets if necessary.)

COMPLAINT

- I. State the grounds for filing this case in Federal Court (include federal statutes and/or U.S. Constitutional provisions, if you know them):

FALSE CLAIM ACT Qui TAM suit

II. Plaintiff, Calvin Burke resides at

200 S. TUCKER BLVD ST. LOUIS, ST. LOUIS,  
street address city county

MO, 63102,  
state zip code telephone number

(if more than one plaintiff, provide the same information for each plaintiff below)

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III. Defendant, KEEFE Commissary lives at, or its business is located at

P.O. BOX 17490, ST. LOUIS, ST. LOUIS,  
street address city county

MO, 63178-7490  
state zip code

(if more than one defendant, provide the same information for each defendant below)

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- IV. Statement of claim (State as briefly as possible the facts of your case. Describe how each defendant is involved. You must state exactly what each defendant personally did, or failed to do, which resulted in harm to you. Include also the names of other persons involved, dates, and places. Be as specific as possible. You may use additional paper if necessary):

1. Relator in this case made several commissary purchases from defendant Keefe Commissary Network Sales (hereafter KCNS) ON : January 19, 2015, January 26, 2015, February 2, 2015 and February 17, 2015. EX: A, B, C and D

2. Each time Relator made a commissary purchase he was charged sale tax despite defendant's KCNS order form clearly stating "Prices include tax" EX: E

3. Defendant KCNS has perpetrated this egregious fraud for more than five years against thousands of jailed inmates in St. Louis City jails and other jails throughout St. Louis County and state of Missouri.

4. Not only that, KCNS has unleashed this double tax Criminal and Civil violation scheme in Cook County Jail in Chicago.

5. On information and belief this double tax Criminal and Civil violation scheme is afoot in many jails and prisons across the United States where defendant KCNS so operates.

6. Defendant KCNS have reasonably converted these illegal gains into profits and have and continue to do so, move such illegal earnings, untaxed profits across multiple state lines to be laundered, thus, violating interstate commerce laws, I.R.S laws among other criminal and civil statutes.

7. This is pure American GREED at its best, operating a Continuing Criminal Enterprise against poor people of color and others which indirectly has siphoned off possibly billions of dollars from those communities; for the purchaser of defendant KCNS products were nothing but a pike line to poor and disenfranchised communities of color through their incarceration.

## Relief Requested

WHEREFORE Relator Request this Honorable Court to have these allegations investigated by MISSOURI, ILLINOIS and other states and Clawback all of KCNS illegal gains with interest and levy punitive fines against them for their actions and compensate Relator as this Court deems just and proper.

Calvin Burke  
Calvin Burke  
February 18, 2015